

WILKINSON) BARKER) KNAUER) LLP

2300 N STREET, NW
SUITE 700
WASHINGTON, DC 20037
TEL 202.783.4141
FAX 202.783.5851
www.wbklaw.com

May 2, 2005

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *American Cellular Corporation*
E911 Quarterly Report – CC Docket No. 94-102

Dear Ms. Dortch:

American Cellular Corporation and its subsidiaries, by its attorneys, hereby submit the attached E911 Quarterly Report on their progress toward and compliance with the terms and conditions of the *Order to Stay* and the Commission's E911 rules.¹

If there are any questions regarding this matter, please contact the undersigned.

Sincerely,

WILKINSON BARKER KNAUER, LLP



By: Lawrence J. Movshin
Lee J. Rosen

Attachment

cc: David Solomon, Chief, Enforcement Bureau
John Muleta, Chief, Wireless Telecommunications Bureau
John Newman, Executive Director, APCO
Robert M. Gurss, Counsel for APCO
Rob Martin, Executive Director, NENA
James R. Hobson, Counsel for NENA and NASNA
Steve Marzolf, President, NASNA

¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002).

E911 Status – Quarterly Report

CC Docket No. 94-102

May 2, 2005

Summary of Report

Pursuant to the *Order to Stay* and the Commission's Public Notice dated June 6, 2003,¹ American Cellular Corporation ("ACC"), as a Tier II carrier, provides this E911 Quarterly Report ("Report"). The Report provides information on all Phase I and Phase II requests received by ACC, including the PSAP ID, Name, State, County, Implementation Phase, Air Interface, Date PSAP Request Made, Date PSAP Request Withdrawn, Invalid Request, Deployed, Date Deployed, Date Projected, Reasons and Comment. Detailed information regarding the requests is contained in the attached chart.

In the course of preparing this E911 Quarterly Report, ACC very recently learned that its employee primarily responsible for the factual input for past reports did not have an accurate understanding of the standards appropriate to determine PSAP approval of extended deployment schedules. Steps have been and are being taken to assure that any factual representations made herein and in the future are complete and accurate in all respects. An analysis of the information in ACC's records has been undertaken under the appropriate standards to prepare the instant report. To the extent that the information in the comment section of the instant report differs from that provided in earlier reports, such difference is intended to better reflect the state of ACC's discussions with the affected PSAPs as to the deployment dates that ACC can achieve.

Phase I Service

ACC has received 89 requests for Phase I services and has activated service in all or in part in 83 of these jurisdictions. ACC has worked diligently with its third-party location solution vendor Intrado, as well as the public safety community, in coordinating Phase I deployment. ACC remains committed to working with its vendors, the PSAPs, and state and local governments, in order to deploy Phase I services in these jurisdictions as soon as possible.²

Phase II Service

A. Deployment Preparation

ACC is a mid-sized carrier servicing predominantly rural and suburban markets in 9 states. ACC relied primarily upon a TDMA-based network of base stations and switching equipment, but has since completed overlaying its TDMA network with GSM/GPRS technology. GSM technology is now operational and being used throughout ACC's network, which consists

¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002) ("*Order to Stay*"); Public Notice, "Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation," DA 03-1902 (rel. June 6, 2003).

² Note that ACC acquired numerous Kentucky markets, but was not provided the actual date of the PSAP request at the time it acquired the markets. Therefore, in lieu of "N/A" as previously used, ACC has utilized a date placeholder of 1/1/01 to comply with FCC procedures. ACC completed Phase I deployment to those markets some time ago, but ACC has inserted the 1/1/01 date as a proxy to address formatting issues raised by Commission staff.

of approximately 8 Mobile Switching Centers, all of which utilize equipment manufactured by Nortel Networks ("Nortel"). ACC has worked with Nortel to prepare for Phase II deployment; all switch upgrades necessary to supply Phase II services were completed by Nortel by June 2002.

ACC has executed an exclusive contract with Andrew Corporation to provide the Position Determining Entity equipment necessary to deploy a Phase II network-based location solution. The vendor has contracted to provide compliant Phase II services in response to all valid PSAP requests as discussed below. ACC has also executed a contract with Polaris Wireless to provide a software solution for E911 Phase II.

B. Phase II Requests

ACC has launched Phase II service in the following jurisdictions: Ulster County, NY. ACC has received new requests since the last quarterly filing for Phase II service from Bracken County, KY; and Lincoln and Vilas Counties, WI. The status of these requests are detailed in the attachment.

To ensure that it may properly prioritize its E911-designated resources, ACC has requested each of these PSAPs to provide documentation pursuant to the *Richardson* criteria.³ Although ACC has not yet received a response to its request from all of these PSAPs, it is proceeding in good faith and has signed a contract with Andrew Corporation and Polaris Wireless to provide Phase II capabilities in all ACC counties.

C. Deployment Issues

ACC, as a rural carrier, has numerous markets that do not have the cell site density to provide accurate Phase II information. ACC has recently employed a software-based solution that it hopes will yield more accurate results in these difficult markets. However, in markets with less than three cell sites, ACC may not be able to provide results which satisfy the Commission's current view of its Phase II requirements.

For ACC's hardware-based solution, in order to meet the Commission's network-based accuracy requirements, Andrew Corporation will need to install Angle-of-Arrival ("AOA") antennas at certain cell sites in addition to the Time Difference of Arrival ("TDOA") equipment that will be installed in individual cell sites. ACC has also been informed that installing AOA antennas may require tower modifications, lease modifications, and zoning approvals – any of which present the potential for delay.

ACC brought similar matters to the Commission's attention in its original waiver request.⁴ Accordingly, if necessary, ACC may avail itself of further waiver procedures to account for the potential market-specific shortcomings a network-based solution in its rural markets may present. The Commission has indicated that it will consider such requests.⁵

³ *Revision of the Commission's Rules to Ensure Compatibility with Enhanced E911 Emergency Calling Systems, Petition of City of Richardson*, CC Docket No. 94-102, *Order*, 16 FCC Rcd 18982, 18986-87 (2001).

⁴ See ACC Petition for Waiver of Sections 20.18(e), (f), and (h) of the Commission's Rules, CC Docket No. 94-102, at 11-15 (filed Sept. 4, 2001).

⁵ See *Order to Stay*, 17 FCC Rcd at 14853.

As required by the *Order to Stay*, a copy of this report is being filed with the Chief of the Enforcement Bureau, the Chief of the Wireless Telecommunications Bureau, and the Executive Directors and Counsels of APCO, NENA, and NANSAs.

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
2964	Laurel County E9-1-1	KY	Laurel/ London	1	TDMA/GSM	11/16/2000		N	Y	11/28/2001			
2964	Laurel County E9-1-1	KY	Laurel/ London	2	TDMA/GSM	6/30/2004		N	N		TBD	4	ACC is working with 3rd party vendor to deploy request. ACC is communicating with PSAP regarding time frame for deployment. ACC records reflect that PSAP has yet to provide necessary Richardson documentation.
2868	Barren-Metcalf E9-1-1	KY	Barren	1	TDMA/GSM	1/1/2001		N	Y	11/27/2001			
2868	Barren-Metcalf E9-1-1	KY	Barren	2	TDMA/GSM	5/4/2004		N	N		TBD	4	ACC is working with 3rd party vendor to deploy request. ACC is communicating with PSAP regarding time frame for deployment. ACC only has one cell tower in Metcalfe County so accuracy will require an alternative solution.
3001	Nelson County Sheriffs Department	KY	Nelson	1	TDMA/GSM	1/1/2001		N	Y	11/27/2001			
3001	Nelson County Sheriffs Department	KY	Nelson	2	TDMA/GSM	10/11/2004		N	N		TBD	4	ACC cell site configuration may make location accuracy a problem. ACC is engaged with 3rd party vendor to resolve the situation.
3021	Rockcastle County 9-1-1	KY	Rockcastle	1	TDMA/GSM	1/1/2001		N	Y	09/24/2001			
3021	Rockcastle County 9-1-1	KY	Rockcastle	2	TDMA/GSM	10/11/2004		N	N		TBD	4	ACC is working with 3rd party vendor to deploy request. ACC is communicating with PSAP regarding time frame for deployment.
2993	Monticello-Wayne County Dispatch Center	KY	Wayne	1	TDMA/GSM	1/1/2001		N	Y	09/24/2001			
2993	Monticello-Wayne County Dispatch Center	KY	Wayne	2	TDMA/GSM	10/11/2004		N	N		TBD	4	ACC is working with 3rd party vendor to deploy request and resolve deployment issues. ACC cell site configuration may make location accuracy a problem.
2987	McCreary County 9-1-1	KY	McCreary	1	TDMA/GSM	1/1/2001		N	Y	09/24/2001			
2987	McCreary County 9-1-1	KY	McCreary	2	TDMA/GSM	10/11/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
2986	Maysville Emergency Services	KY	Mason	1	TDMA/GSM	1/1/2001		N	Y	08/29/2001			
2986	Maysville Emergency Services	KY	Mason	2	TDMA/GSM	6/10/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation. ACC records reflect that PSAP has yet to provide necessary Richardson documentation.
2923	Hart County Dispatch	KY	Hart	1	TDMA/GSM	1/1/2001		N	Y	08/21/2001			
2923	Hart County Dispatch	KY	Hart	2	TDMA/GSM	10/11/2004		N	N		TBD	4	ACC is working with 3rd party vendor to deploy request. ACC is communicating with PSAP regarding time frame for deployment.
2898	Danville-Boyle County 9-1-1 Center	KY	Boyle	1	TDMA/GSM	8/17/2000		N	Y	08/14/2001			
2898	Danville-Boyle County 9-1-1 Center	KY	Boyle	2	TDMA/GSM	6/15/2004		N	N		TBD	4	ACC maintains only two cell sites in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
2869	Bath County Dispatch	KY	Bath	1	TDMA/GSM	1/1/2001		N	Y	06/05/2001			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
2869	Bath County Dispatch	KY	Bath	2	TDMA/GSM	10/11/2004		N	N		TBD	4	ACC maintains only two cell sites in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
2970	Lewis County Detention Center	KY	Lewis	1	TDMA/GSM	1/1/2001		N	Y	06/05/2001			
2970	Lewis County Detention Center	KY	Lewis	2	TDMA/GSM	10/11/2004		N	N		TBD	4	ACC maintains only two cell sites in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
2990	Menifee County Fire Dispatch	KY	Menifee	1	TDMA/GSM	1/1/2001		N	Y	05/31/2001			
2990	Menifee County Fire Dispatch	KY	Menifee	2	TDMA/GSM	10/11/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
2972	Lincoln County 9-1-1	KY	Lincoln	1	TDMA/GSM	1/1/2001		N	Y	05/31/2001			
2972	Lincoln County 9-1-1	KY	Lincoln	2	TDMA/GSM	10/11/2004		N	N		TBD	4	ACC maintains only two cell sites in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
3023	Russell County Dispatch	KY	Russell	1	TDMA/GSM	1/1/2001		N	Y	05/18/2001			
3023	Russell County Dispatch	KY	Russell	2	TDMA/GSM	10/11/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
2879	Burkesville Police Department	KY	Cumberland	1	TDMA/GSM	1/1/2001		N	Y	05/18/2001			
2879	Burkesville Police Department	KY	Cumberland	2	TDMA/GSM	10/11/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
2860	Albany Police Department	KY	Clinton	1	TDMA/GSM	1/1/2001		N	Y	05/18/2001			
2860	Albany Police Department	KY	Clinton	2	TDMA/GSM	10/11/2004		N	N		TBD	4	ACC maintains only two cell sites in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
3029	Spencer County	KY	Spencer	1	TDMA/GSM	1/1/2001		N	Y	08/09/2001			
3029	Spencer County	KY	Spencer	2	TDMA/GSM	10/11/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
2997	Mt Sterling Police Department	KY	Montgomery	1	TDMA/GSM	1/1/2001		N	Y	09/19/2001			
2979	Madison County E9-1-1	KY	Madison	1	TDMA/GSM	8/11/1998		N	Y	07/13/2001			
2979	Madison County E9-1-1	KY	Madison	2	TDMA/GSM	5/26/2004		N	N		TBD	4	ACC is working with 3rd party vendor to deploy request. ACC is communicating with PSAP regarding time frame for deployment. ACC records reflect that PSAP has yet to provide necessary Richardson documentation.
2994	Morehead Police Department	KY	Morehead/Rowan	1	TDMA/GSM	11/9/2001		N	Y	12/07/2001			
2994	Morehead Police Department	KY	Morehead/Rowan	2	TDMA/GSM	05/21/2002		N	N		TBD	4	ACC has built an additional tower, giving the county four towers to provide an E911 Phase II solution, although coverage area will be limited. ACC is working with 3rd party vendor to deploy request.
2859	Adair County 9-1-1 Center	KY	Adair	1	TDMA/GSM	7/2/2001		N	Y	12/06/2001			
2859	Adair County 9-1-1 Center	KY	Adair	2	TDMA/GSM	3/24/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
2992	Monroe County Ambulance and 9-1-1 Center	KY	Monroe	1	TDMA/GSM	1/4/2001		N	Y	03/21/2002			
2992	Monroe County Ambulance and 9-1-1 Center	KY	Monroe	2	TDMA/GSM	5/20/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation. ACC records reflect that PSAP has yet to provide necessary Richardson documentation.
2884	Campbellsville 9-1-1 Communications	KY	Taylor	1	TDMA/GSM	12/4/2000		N	Y	03/22/2002			
2884	Campbellsville 9-1-1 Communications	KY	Taylor	2	TDMA/GSM	4/15/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
2922	Harrodsburg Police Department	KY	Mercer	1	TDMA/GSM	4/30/2001		N	Y	05/01/2002			
2922	Harrodsburg Police Department	KY	Mercer	2	TDMA/GSM	3/23/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation. ACC has requested a meeting with the PSAP to discuss deployment issues.
3017	Pulaski County 9-1-1	KY	Pulaski	1	TDMA/GSM	7/17/2000		N	Y	12/05/2001			
3017	Pulaski County 9-1-1	KY	Pulaski	2	TDMA/GSM	6/21/2004		N	N		TBD	4	ACC is working with 3rd party vendor to deploy request. ACC records reflect that PSAP has yet to provide necessary Richardson documentation.
2864	Anderson County Ambulance Service	KY	Anderson	1	TDMA/GSM	2/28/2001		N	Y	02/18/2002			
2920	Hardin County 9-1-1	KY	Hardin	1	TDMA/GSM	7/6/2000		N	Y	12/20/2001			
2920	Hardin County 9-1-1	KY	Hardin	2	TDMA/GSM	5/28/2004		N	N		TBD	4	ACC is working with 3rd party vendor to deploy request.
2963	Larue County Dispatch	KY	Larue	1	TDMA/GSM	7/17/2000		N	Y	12/19/2001			
2963	Larue County Dispatch	KY	Larue	2	TDMA/GSM	9/1/2004		N	N		TBD	4	ACC maintains only two cell sites in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation. ACC records reflect that PSAP has yet to provide necessary Richardson documentation.
2916	Greensburg Police Department	KY	Green	1	TDMA/GSM	1/4/2001		N	Y	12/11/2001			
2916	Greensburg Police Department	KY	Green	2	TDMA/GSM	7/15/2003		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation. ACC has requested a meeting with the PSAP to discuss deployment issues.
2890	Casey County Dispatch	KY	Casey	1	TDMA/GSM	1/1/2001		N	Y	12/14/2001			
2890	Casey County Dispatch	KY	Casey	2	TDMA/GSM	10/11/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
2875	Bracken County Dispatch	KY	Bracken	1	TDMA/GSM	1/1/2001		N	Y	04/19/2002			
2875	Bracken County Dispatch	KY	Bracken	2	TDMA/GSM	10/11/2004		Y	N		TBD		
2875	Bracken County Dispatch	KY	Bracken	2	TDMA/GSM	1/31/2005		N	N		07/31/2005		Original request sent by Kentucky State Police, but county has taken over PSAP responsibilities and sent new request, which Dobson is treating as valid. ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
2886	Carlisle Police Department	KY	Nicholas	1	TDMA/GSM	1/1/2001		N	Y	04/19/2002			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
2886	Carlisle Police Department	KY	Nicholas	2	TDMA/GSM	10/11/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
3020	Robertson County EMS	KY	Robertson	1	TDMA/GSM	1/1/2001		N	Y	04/23/2002			
3020	Robertson County EMS	KY	Robertson	2	TDMA/GSM	10/11/2004		N	N		N/A		ACC maintains zero cell sites in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
3030	Springfield-Washington County E9-1-1	KY	Washington	2	TDMA/GSM	3/31/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
2962	Lancaster Garrard 9-1-1	KY	Garrard	2	TDMA/GSM	6/9/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
2907	Flemming County Dispatch	KY	Fleming	2	TDMA/GSM	6/30/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation. ACC has requested a meeting with the PSAP to discuss deployment issues.
2967	Lebanon Police Department	KY	Marion	2	TDMA/GSM	10/11/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
2931	Jackson County 9-1-1	KY	Jackson	2	TDMA/GSM	10/11/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
7567	Marion County Central Communications	WV	Marion	1	TDMA/GSM	6/1/2000		N	Y	04/11/2001			
7567	Marion County Central Communications	WV	Marion	2	TDMA/GSM	8/27/2003		N	N		05/31/2005	4	ACC has installed the necessary equipment for E911 Phase II service for its TDMA network and expects to deploy by the end of the month. ACC has installed part of its GSM network, and hopes to complete deployment as soon as practicably possible. ACC has been in contact with PSAP to discuss deployment schedule.
7581	Morgantown Police Department	WV	Monongalia	1	TDMA/GSM	6/1/2000		N	Y	03/30/2001			
7581	Morgantown Police Department	WV	Monongalia	2	TDMA/GSM	8/27/2003		N	N		06/01/2005	4	ACC has installed the necessary equipment for E911 Phase II service for its TDMA network and expects to deploy by the end of the month. ACC has installed part of its GSM network, and hopes to complete deployment as soon as practicably possible. ACC has been in contact with PSAP to discuss deployment
7559	Harrison County Bureau of Emergency Services	WV	Harrison	1	TDMA/GSM	6/1/2000		N	Y	03/30/2001			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
7559	Harrison County Bureau of Emergency Services	WV	Harrison	2	TDMA/GSM	8/27/2003		N	N		06/02/2005	4	ACC has installed the necessary equipment for E911 Phase II service for its TDMA network and expects to deploy by the end of the month. ACC has installed part of its GSM network, and hopes to complete deployment as soon as practicably possible. ACC has been in contact with PSAP to discuss deployment
7589	Preston County Communications Center	WV	Preston	1	TDMA/GSM	6/1/2000		N	Y	04/11/2001			
7589	Preston County Communications Center	WV	Preston	2	TDMA/GSM	8/27/2003		N	N		06/03/2005	4	ACC has installed the necessary equipment for E911 Phase II service for its TDMA network and expects to deploy by the end of the month. ACC has installed part of its GSM network, and hopes to complete deployment as soon as practicably possible. ACC has been in contact with PSAP to discuss deployment
7596	Taylor County Emergency Services	WV	Taylor	1	TDMA/GSM	6/1/2000		N	Y	08/27/2002			
7596	Taylor County Emergency Services	WV	Taylor	2	TDMA/GSM	8/27/2003		N	N		06/06/2005	4	ACC has installed the necessary equipment for E911 Phase II service for its TDMA network and expects to deploy by the end of the month. ACC has installed part of its GSM network, and hopes to complete deployment as soon as practicably possible. ACC has been in contact with PSAP to discuss deployment schedule.
7608	Wetzel County Emergency Communications	WV	Wetzel	1	TDMA/GSM	4/18/2003		N	Y	12/03/2003			
7605	West Union Fire Department (CCI)	WV	Doddridge	1	TDMA/GSM	6/30/2003		N	Y	11/14/2003			
7605	West Union Fire Department (CCI)	WV	Doddridge	2	TDMA/GSM	3/18/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
7593	Ritchie County (CCI)	WV	Ritchie	1	TDMA/GSM	6/30/2003		N	Y	11/14/2003			
7593	Ritchie County (CCI)	WV	Ritchie	2	TDMA/GSM	3/18/2004		N	N		TBD	4	ACC maintains only one cell site in area so location accuracy will be a problem. ACC is engaged with 3rd party vendor to resolve the situation.
7543	Barbour County Communications Center	WV	Barbour	1	TDMA/GSM	6/8/2004		N	N		TBD	4	ACC is having difficulty in establishing trunks to the selective router. ACC is working with the LEC to process the facilities orders. ACC has been in contact with PSAP to work out deployment schedule.
7564	Lewis County 9-1-1	WV	Lewis	1	TDMA/GSM	10/13/2004		N	N		TBD	4	ACC is having difficulty in establishing trunks to the selective router. ACC is working with the LEC to process the facilities orders. ACC has been in contact with PSAP to work out deployment schedule.
7564	Lewis County 9-1-2	WV	Lewis	2	TDMA/GSM	10/13/2004		N	N		TBD	4	Phase II is contingent on installation of necessary Phase I equipment. See Lewis Phase I (PSAP ID# 7564)

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
7553	Gilmer County Sheriffs Department	WV	Gilmer	1	TDMA/GSM	10/13/2004		N	N		TBD	4	ACC is having difficulty in establishing trunks to the selective router. ACC is working with the LEC to process the facilities orders. ACC has been in contact with PSAP to work out deployment schedule.
7553	Gilmer County Sheriffs Department	WV	Gilmer	2	TDMA/GSM	10/13/2004		N	N		TBD	4	See Phase I (Gilmer PSAP ID 7553) ACC maintains only one cell site in area and location accuracy will be a problem.
3456	Marquette County Central Dispatch	MI	Marquette	1	TDMA/GSM	4/30/2001		N	Y	02/21/2002			
3456	Marquette County Central Dispatch	MI	Marquette	2	TDMA/GSM	1/28/2004		N	N		TDMA - 5/9/05 GSM - 7/15/05	4	ACC expects to deploy TDMA E911 service by 5/9/05. GSM E911 service cannot be deployed until mid-July when 3rd party provider performs necessary software upgrade. PSAP has been informed of necessary upgrade.
3369	Dickinson County Sheriffs Office	MI	Dickinson	1	TDMA/GSM	4/30/2001		N	Y	02/21/2002			
3369	Dickinson County Sheriffs Office	MI	Dickinson	2	TDMA/GSM	1/27/2004		N	N		TDMA - 5/9/05 GSM - 7/15/05	4	ACC expects to deploy TDMA E911 service by 5/9/05. GSM E911 service cannot be deployed until mid-July when 3rd party provider performs necessary software upgrade. PSAP has been informed of necessary upgrade. ACC maintains only one cell site in county and location accuracy will be a problem.
3464	Menominee County Central Dispatch	MI	Menominee	1	TDMA/GSM	4/30/2001		N	Y	02/25/2002			
3464	Menominee County Central Dispatch	MI	Menominee	2	TDMA/GSM	1/29/2004		N	N		TDMA - 5/9/05 GSM - 7/15/05	4	ACC expects to deploy TDMA E911 service by 5/9/05. GSM E911 service cannot be deployed until mid-July when 3rd party provider performs necessary software upgrade. PSAP has been informed of necessary upgrade.
3422	Iron County 9-1-1	MI	Iron	1	TDMA/GSM	4/30/2001		N	Y	02/27/2002			
3422	Iron County 9-1-2	MI	Iron	2	TDMA/GSM	1/20/2004		N	N		TDMA - 5/9/05 GSM - 7/15/05	4	ACC expects to deploy TDMA E911 service by 5/9/05. GSM E911 service cannot be deployed until mid-July when 3rd party provider performs necessary software upgrade. PSAP has been informed of necessary upgrade. ACC maintains only one cell site in county and location accuracy will be a problem.
3516	Ontonagon County Sheriffs Office	MI	Ontonagon	1	TDMA/GSM	4/30/2001		N	Y	10/02/2003			
3516	Ontonagon County Sheriffs Office	MI	Ontonagon	2	TDMA/GSM	4/23/2004		N	N		TDMA - 5/9/05 GSM - 7/15/05	4	ACC expects to deploy TDMA E911 service by 5/9/05. GSM E911 service cannot be deployed until mid-July when 3rd party provider performs necessary software upgrade. PSAP has been informed of necessary upgrade. ACC maintains only one cell site in county and location accuracy will be a problem.
3433	Keweenaw County Sheriffs Office	MI	Keweenaw	1	TDMA/GSM	4/30/2001		N	Y	09/30/2003			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3433	Keweenaw County Sheriffs Office	MI	Keweenaw	2	TDMA/GSM	11/15/2004		N	N		TDMA - 5/9/05 GSM - 7/15/05		ACC expects to deploy TDMA E911 service by 5/9/05. GSM E911 service cannot be deployed until mid-July when 3rd party provider performs necessary software upgrade. PSAP has been informed of necessary upgrade.
3413	Houghton County Central Dispatch	MI	Houghton	1	TDMA/GSM	4/30/2001		N	Y	03/28/2002			
3413	Houghton County Central Dispatch	MI	Houghton	2	TDMA/GSM	1/6/2004		N	N		TDMA - 5/9/05 GSM - 7/15/05	4	ACC is working with 3rd party vendor to deploy Phase II WLS equipment. ACC is in contact with PSAP regarding deployment schedule.
3319	Baraga County Sheriff	MI	Baraga	1	TDMA/GSM	4/30/2001		N	Y	10/02/2003			
3319	Baraga County Sheriff	MI	Baraga	2	TDMA/GSM	9/19/2003		N	N		TDMA - 5/9/05 GSM - 7/15/05	4	ACC is working with 3rd party vendor to update necessary equipment and deploy Phase II WLS equipment. ACC is in contact with PSAP regarding deployment schedule. ACC has only one tower in this county and once deployed accuracy remains a problem
3393	Gogebic County Sheriffs Office	MI	Gogebic	1	TDMA/GSM	2/24/2003		N	Y	12/03/2003			
3393	Gogebic County Sheriffs Office	MI	Gogebic	2	TDMA/GSM	2/25/2004		N	N		TDMA - 5/9/05 GSM - 7/15/05	4	ACC expects to deploy TDMA E911 service by 5/9/05. GSM E911 service cannot be deployed until mid-July when 3rd party provider performs necessary software upgrade. PSAP has been informed of necessary upgrade.
3596	Aitkin County Sheriffs Office	MN	Aitkin	1	TDMA/GSM	1/31/2001		N	Y	03/20/2003			
3596	Aitkin County Sheriffs Office	MN	Aitkin	2	TDMA/GSM	3/1/2002		N	N		TBD		State of Minnesota, Department of Administration, Statewide 9-1-1 Program has requested Phase II service for all counties in which ACC serves. Counties involved have demonstrated readiness for accepting Phase II information. ACC recently met with E911 administrator to negotiate an alternative deployment date. ACC is waiting on a necessary software upgrade from 3rd party vendor and will be able to deploy E911 service pending upgrade.
3600	Becker County Sheriffs Office	MN	Becker	1	TDMA/GSM	1/31/2001		N	Y	02/12/2003			
3600	Becker County Sheriffs Office	MN	Becker	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3601	Beltrami County Law Enforcement Center	MN	Beltrami	1	TDMA/GSM	1/31/2001		N	Y	07/10/2002			
3601	Beltrami County Law Enforcement Center	MN	Beltrami	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3610	Carlton County Sheriffs Office	MN	Carlton	1	TDMA/GSM	1/31/2001		N	Y	03/24/2004			
3610	Carlton County Sheriffs Office	MN	Carlton	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3612	Cass County Sheriffs Office	MN	Cass	1	TDMA/GSM	1/31/2001		N	Y	07/10/2002			
3612	Cass County Sheriffs Office	MN	Cass	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3620	Crow Wing County Sheriffs Office	MN	Crow Wing	1	TDMA/GSM	1/31/2001		N	Y	03/17/2003			
3620	Crow Wing County Sheriffs Office	MN	Crow Wing	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3623	Douglas County Sheriffs Office	MN	Douglas	1	TDMA/GSM	1/31/2001		N	Y	06/27/2002			
3623	Douglas County Sheriffs Office	MN	Douglas	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3633	Grant County Sheriffs Office	MN	Grant	1	TDMA/GSM	1/31/2001		N	Y	07/08/2002			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3633	Grant County Sheriffs Office	MN	Grant	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3640	Hubbard County Sheriffs Office	MN	Hubbard	1	TDMA/GSM	1/31/2001		N	Y	03/23/2004			
3640	Hubbard County Sheriffs Office	MN	Hubbard	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3643	Itasca County Sheriffs Office	MN	Itasca	1	TDMA/GSM	1/31/2001		N	Y	07/12/2002			
3643	Itasca County Sheriffs Office	MN	Itasca	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3645	Kanabec County Sheriffs Office	MN	Kanabec	1	TDMA/GSM	1/31/2001		N	Y	07/03/2002			
3645	Kanabec County Sheriffs Office	MN	Kanabec	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3648	Koochiching County Sheriffs Office	MN	Koochiching	1	TDMA/GSM	1/31/2001		N	Y	03/23/2004			
3648	Koochiching County Sheriffs Office	MN	Koochiching	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3650	Lake County Sheriffs Office	MN	Lake	1	TDMA/GSM	1/31/2001		N	Y	4/31/2002			
3650	Lake County Sheriffs Office	MN	Lake	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3667	Mille Lacs County Sheriffs Office	MN	Mille Lacs	1	TDMA/GSM	1/31/2001		N	Y	02/18/2003			
3667	Mille Lacs County Sheriffs Office	MN	Mille Lacs	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3685	Morrison County Sheriffs Office	MN	Morrison	1	TDMA/GSM	1/31/2001		N	Y	03/18/2003			
3685	Morrison County Sheriffs Office	MN	Morrison	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3695	Otter Tail County Sheriffs Office	MN	Otter Tail	1	TDMA/GSM	1/31/2001		N	Y	06/27/2002			
3695	Otter Tail County Sheriffs Office	MN	Otter Tail	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3698	Pine County Sheriffs Office	MN	Pine	1	TDMA/GSM	1/31/2001		N	Y	06/27/2002			
3698	Pine County Sheriffs Office	MN	Pine	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3701	Pope County Sheriffs Office	MN	Pope	1	TDMA/GSM	1/31/2001		N	Y	02/19/2003			
3701	Pope County Sheriffs Office	MN	Pope	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3716	St Louis County Emergency Communications-Duluth	MN	St Louis North	1	TDMA/GSM	1/31/2001		N	Y	02/13/2003			
3716	St Louis County Emergency Communications-Duluth	MN	St Louis North	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3717	St Louis County Emergency Communications-Virginia	MN	St Louis South	1	TDMA/GSM	1/31/2001		N	Y	02/17/2003			
3717	St Louis County Emergency Communications-Virginia	MN	St Louis South	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3723	Stevens County Sheriffs Office	MN	Stevens	1	TDMA/GSM	1/31/2002		N	Y	09/23/2003			
3723	Stevens County Sheriffs Office	MN	Stevens	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3724	Swift County Sheriffs Office	MN	Swift	1	TDMA/GSM	1/31/2001		N	Y	05/06/2002			
3724	Swift County Sheriffs Office	MN	Swift	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3726	Todd County Sheriffs Office	MN	Todd	1	TDMA/GSM	1/31/2001		N	Y	03/17/2003			
3726	Todd County Sheriffs Office	MN	Todd	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3730	Wadena County Sheriffs Office	MN	Wadena	1	TDMA/GSM	1/31/2001		N	Y	05/06/2002			
3730	Wadena County Sheriffs Office	MN	Wadena	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
3737	Wilkin County Law Enforcement Center	MN	Wilkin	1	TDMA/GSM	1/31/2001		N	Y	02/12/2003			
3737	Wilkin County Law Enforcement Center	MN	Wilkin	2	TDMA/GSM	3/1/2002		N	N		TBD		See comment for Aitkin, MN (PSAPID 3596).
5369	Hocking County 9-1-1	OH	Hocking	1	TDMA/GSM	3/1/2002		N	Y	06/18/2002			
5369	Hocking County 9-1-1	OH	Hocking	2	TDMA/GSM	3/1/2002		N	N		TBD	4	ACC maintains only one cell site in area and location accuracy will be a problem. ACC continues to work to resolve deployment issues. ACC intends to deploy fully once these issues can be resolved. ACC is planning to meet with PSAP to further discuss deployment issues.
2788	Montgomery County Sheriffs Office	KS	Montgomery	1	TDMA/GSM	7/15/2002		N	Y	11/07/2003			

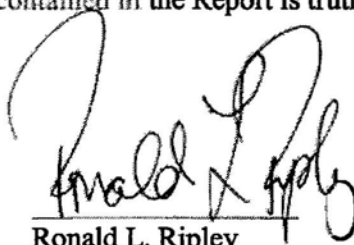
PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
2788	Montgomery County Sheriffs Office	KS	Montgomery	2	TDMA/GSM	7/15/2002		N	N		TBD	4	ACC is working with the 3rd party vendor to engineer means to comply with the FCC E911 Phase II requirements.
5197	Schoharie County Sheriffs Department	NY	Schoharie	1	TDMA/GSM	11/4/2002		N	Y	10/03/2003			
5197	Schoharie County Sheriffs Department	NY	Schoharie	2	TDMA/GSM	11/4/2002	9/20/2004	N	N				Initial PSAP request withdrawn. New request concurrently submitted by PSAP.
5197	Schoharie County Sheriffs Department	NY	Schoharie	2	TDMA/GSM	9/20/2004		N	N		TBD	4	ACC is working with E-911 vendors to deploy the Phase II Request.
5173	Otsego County Public Safety Communications	NY	Otsego	1	TDMA/GSM	02/20/2003		N	Y	09/03/2003			
5173	Otsego County Public Safety Communications	NY	Otsego	2	TDMA/GSM	02/20/2003		N	N		TBD	4	ACC is working with E-911 vendors to deploy the Phase II Request.
5220	Ulster County Emergency Communication Center At Golden Hill	NY	Ulster	1	TDMA/GSM	02/04/2003		N	Y	05/28/2004			
5220	Ulster County Emergency Communication Center At Golden Hill	NY	Ulster	2	TDMA/GSM	07/29/2004		N	Y	04/19/2005			
9512	Orange County Emergency Services	NY	Orange	1	TDMA/GSM	06/08/2004		N	Y	04/05/2005			
5068	Dutchess County Sheriffs Department	NY	Dutchess	1	TDMA/GSM	06/16/2003		N	Y	08/12/2004			
5208	Steuben County Sheriffs Office	NY	Steuben	1	TDMA/GSM	11/03/2004		N	N		TBD		
5208	Steuben County Sheriffs Office	NY	Steuben	2	TDMA/GSM	11/03/2004		N	N		TBD		
7458	Marinette County	WI	Marinette	1	TDMA/GSM	01/18/2005		N	N		07/18/2005		
7458	Marinette County	WI	Marinette	2	TDMA/GSM	01/18/2005		N	N		07/18/2005		
7455	Lincoln County Emergency Management	WI	Lincoln	1	TDMA/GSM	01/19/2005		N	N		07/19/2005		
7455	Lincoln County Emergency Management	WI	Lincoln	2	TDMA/GSM	01/19/2005		N	N		07/19/2005		
7524	Vilas County Sheriffs Department	WI	Vilas	1	TDMA/GSM	04/14/2005		N	N		10/11/2005		
7524	Vilas County Sheriffs Department	WI	Vilas	2	TDMA/GSM	04/14/2005		N	N		10/11/2005		

AFFIDAVIT OF RONALD L. RIPLEY

I, Ronald L. Ripley, do hereby declare that the following is true and accurate:

I am an officer of American Cellular Corporation ("ACC").

I have reviewed the ACC E911 Quarterly Report ("Report") and to the best of my knowledge, information, or belief, all of the information contained in the Report is truthful and accurate.

A handwritten signature in black ink, appearing to read "Ronald L. Ripley", written over a horizontal line.

Ronald L. Ripley
Senior Vice President &
General Counsel

Executed on: May 2, 2005

CERTIFICATE OF SERVICE

I, Ernestine M. Screven, hereby certify that on the 2nd day of May 2005, copies of the foregoing "E911 Quarterly Report" have been served by either first class mail, postage prepaid to the following:

David H. Solomon
Chief
Enforcement Bureau
Federal Communications Bureau
445 12th Street, S.W., Room 7C-485
Washington, D.C. 20554

John Newman
Executive Director, APCO
APCO International, Inc.
World Headquarters
351 N. Williamson Blvd.
Daytona Beach, FL 32114

Rob Martin
Executive Director
National Emergency Number Association
4350 North Fairfax Drive
Suite 750
Arlington, VA 22203

Steve Marzolf
President, NASNA
VITA/Divs. Public Safety Cmn.
110 S. 7th St., Su. 100
Richmond, VA 23219-3931

John Muleta
Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Robert M. Gurss
Director, Legal and Government Affairs
APCO International
1725 DeSales Street, N.W.
#808
Washington, D.C. 20036

James R. Hobson
Counsel for NENA and NASNA
Miller & Van Eaton
1155 Connecticut Avenue, N.W.
Washington, D.C. 20036

/s/ Ernestine M. Screven

Ernestine M. Screven